From: "Bryan, David" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE;GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DE67FD66319E475AA76B7FB0C64D64B5-BRYAN,DAVID>

To: "R7 Senior" <Staff>

CC:

Date: 6/10/2013 6:27:33 AM

Subject: Inside EPA - Environmentalists Say EPA's Survey of MissouriNuclear Site Is Incomplete

Inside EPA - 06/10/2013

## **Environmentalists Say EPA's Survey of Missouri Nuclear Site Is Incomplete**

http://insideepa.com/Superfund-Report/Superfund-Report-06/10/2013/environmentalists-say-epas-survey-of-missouri-nuclear-site-is-incomplete/menu-id-128.html

Environmentalists are warning EPA not to put too much weight on a recent aerial radiological survey it conducted of a high-profile Superfund site outside St. Louis, arguing the study does not show the full extent of possible contamination such as groundwater seepage.

The agency conducted the survey in March as part of an ongoing effort to review a 2008 decision to leave nuclear contamination in place with a protective cap at the West Lake Landfill in Bridgeton, MO. Environmentalists across the country fear that decision would set a precedent for how EPA deals with similar radioactive waste sites in the future.

The results of the aerial survey, released May 29, says radioactive waste buried at the site "is within the fenced area of the site and is inaccessible to the public, so it does not pose a public health risk." In a press release announcing the report, Region VII Administrator Karl Brooks says, "A person would have to illegally trespass onto the site to be exposed to elevated levels of radiation." *Relevant documents are available on InsideEPA.com.* (*Doc ID:* <u>2436336</u>)

But a source with the Missouri Coalition for the Environment says the aerial survey can only detect radiation up to one foot below ground. The source says it cannot show, for example, whether radiation has seeped into groundwater and moved laterally across the site.

The survey "should be a tool in the tool belt," the source says. "And I agree it's useful. But you have to remember it has limitations in its usefulness. It's shortsighted or premature or both to say the radwaste is contained using this information exclusively."

EPA conducted the survey using the Airborne Spectral Photometric Environmental Collection Technology (ASPECT) program, which uses a neutron detection device mounted on an airplane that makes several passes over an affected area to map locations with elevated radiation levels. The agency used the technology instead of ground monitoring equipment because of heavy vegetation on parts of the landfill.

The survey showed areas with "significantly higher than background" radiation levels were concentrated in the northernmost portion of the site known as "Area 2." A smaller section, known as "Area 1" was earlier found to have radiological wastes, but it "did not register a significant deviation from background" in the survey.

EPA has been weighing how to handle West Lake's nuclear contamination for years and in 2008 announced a plan to leave the waste in place under a cap and monitor the site. After public outcry, the agency shelved the idea in favor of further study. In 2011, an agency-mandated study suggested two alternatives to the Bush-era plan, but said the alternatives were more expensive than the original decision, which is still being considered.

The National Remedy Review Board (NRRB), a panel at EPA headquarters that seeks to ensure consistent cleanup decisions nationwide, has urged the agency to consider a "hybrid" option of removing the highest level radioactive material while leaving lower level waste in place and under a cap.

As part of its review, EPA required potentially responsible parties (PRPs) to conduct four rounds of groundwater sampling. The second round, conducted in April, will be discussed during a June 25 public meeting to be held in the nearby town of Maryland Heights, MO. The third round of sampling will be conducted in July with a final round scheduled for October.

The environmentalist pointed to the first set of groundwater monitoring data from December 2012 showing significant concentrations of radium-228 at a well located south of the Area 1 site. Specifically, the well shows 32 picocuries per liter (pCi/L), higher than EPA's maximum contaminant level of 5 pCi/L.

"We know this stuff is there, and we know it's mixing with the groundwater," the source says. Environmentalists and state regulators had earlier criticized the groundwater report -- which was prepared on behalf of the PRPs -- for saying contamination had not entered groundwater and spread to other areas of the site, when the report's data showed otherwise. (*Superfund Report*, Feb. 4).

Another chief concern at the site is an underground smoldering fire at the adjacent Bridgeton Landfill, with nearby residents fearing the fire could spread and eventually reach the nuclear waste.

It is unclear how far the fire is from the radiological waste. The owner of the Bridgeton Landfill, Republic Services Inc., estimates the distance at 1,200 feet from the edge of Area 1. In May, state Attorney General Chris Koster (D) estimated the distance at about 1,000 feet.

During its aerial survey, EPA also conducted infrared monitoring of the Bridgeton Landfill to provide more information. But the resulting images showed no "heat signatures that could be attributed to the subsurface smoldering event."

The Missouri Department of Natural Resources, which regulates the second landfill, says, "To date, all landfill data indicates the smoldering event is contained in the solid waste cell and has not impacted the adjacent radioactive cell." The environmentalist has asked state regulators to better explain how they reached that conclusion.

Robert Criss, a geology professor at Washington University in St. Louis, issued a March 14 report with a series of recommendations for the site. The report argues it is risky to leave the nuclear material in place because the landfill is not lined, the waste could become more radioactive for thousands of years and the waste could be spread during a

flood or seep into groundwater. The report also says some reports overstate background levels of radiation.

Criss also says EPA and PRPs have not "acquired essential data, . . . properly interpreted their data, or considered relevant reports published by disinterested parties." He writes: "It is not acceptable that so little is known about this radwaste after more than 30 years of 'study."

Environmentalists have also pushed for the Army Corps of Engineers to take over the cleanup, arguing that agency is better able to handle the site because it has cleaned up several nuclear waste sites in the St. Louis area. Democratic lawmakers in the state House and Senate proposed resolutions urging the Corps to assume responsibility for the cleanup, but neither effort made it out of committee before the legislative session ended last month. -- Lee Logan